

# SILVER & SILVER APC

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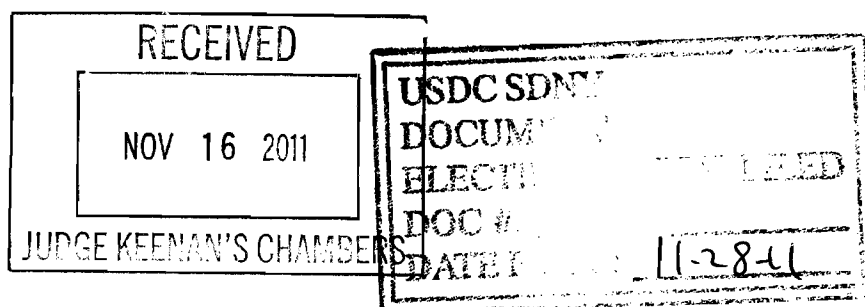
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# MEMO ENDORSED

November 16, 2011

## BY FACSIMILE

Hon. John F. Keenan  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312



**Re:    *General Patent Corporation v. Wi-LAN, Inc., Gladios IP Inc., and  
Paul J. Lerner, Case No. 11 Civ. 6585 (S.D.N.Y.)***

Dear Judge Keenan:


On behalf of Plaintiff General Patent Corporation ("GPC"), we write to respectfully request an order, pursuant to Federal Rule of Civil Procedure 62(c): (i) staying the effectiveness of the Court's Order of November 14, 2011, which vacated the Temporary Restraining Order (the "TRO") entered on September 23, 2011 and denied GPC's application for a preliminary injunction (the "Order"); and (ii) reinstating the TRO pending GPC's anticipated appeal of the Order. GPC requests such a stay in order to preserve the status quo and avoid the irreparable harm that would result to GPC should the Order become immediately effective and subsequently reversed on appeal. If the Court grants such relief, GPC will seek to expedite the appeal.

In the alternative, GPC respectfully requests that the Court stay the effectiveness of the Order and reinstate the TRO until five business days after the Court issues its full opinion with respect to the Order, in order to provide GPC an opportunity to move the Court of Appeals, with the benefit of the Court's full opinion, for a stay of the Order and a preliminary injunction pending appeal.

GPC is prepared to brief the issues raised herein should the Court deem such briefing useful in deciding GPC's request.

We thank the Court for its time and attention to this request.

Respectfully submitted,



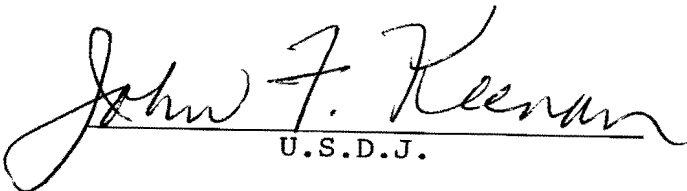
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Plaintiff's application to stay the effectiveness  
of the Court's Order of November 14, 2011 and  
reinstate the Temporary Restraining Order is denied.

SO ORDERED.

Dated: New York, N.Y.  
November 28, 2011

  
U.S.D.J.